

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Marvin Fleming, et al. v. National Football
League, et al. (Plaintiffs Bruce Thornton
and Janet Thornton ONLY)

Court File No. 2:13-cv-51-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS BRUCE
THORNTON AND JANET
THORNTON**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Bruce Thornton and Janet Thornton only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Marvin Fleming, et al. v. National Football League, et al.*, No. 2:13-cv-51-AB, in the Eastern District of Pennsylvania on January 4, 2013, for the benefit of several retired National Football League players, including Bruce Thornton and Janet Thornton.

2. Plaintiffs' counsel filed a short form complaint for Bruce Thornton and Janet Thornton on January 10, 2013.

3. Since then, irreconcilable differences have arisen between Plaintiffs Bruce Thornton, Janet Thornton, and the undersigned.

4. Plaintiffs' counsel properly notified Bruce Thornton and Janet Thornton of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Bruce Thornton and Janet Thornton only in Court File No. 2:13-cv-51-AB.

Dated: May 30, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

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